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Attorneys for Non-Party
LESLEY ZHU

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

LESLEY ZHU,

Movant,

v.

RETROPHIN, INC., et al.,

Respondents.

Case No.: 2:19-mc-137

**NON-PARTY LESLEY ZHU'S
NOTICE OF MOTION AND
MOTION TO TO QUASH THE
SUBPOENA AD TESTIFICANDUM
AND TO TRANSFER THE MOTION
TO QUASH PURSUANT TO FED. R.
CIV. P. 45(F)**

Date:
Time:
Dept:

Judge:
Filed:

Non-party Lesley Zhu, by and through her undersigned counsel, hereby moves the Court pursuant to Fed. R. Civ. P. 26 and 45 to quash the Subpoena *Ad Testificandum* served on June 17, 2019 (the "Subpoena") by Defendant-Respondent Retrophin, Inc. ("Retrophin"), and requests an Order requiring Retrophin to pay the reasonable attorneys' fees in preparing and filing this motion. Ms. Zhu further moves the Court, pursuant to Fed. R. Civ. P. 45(f), to transfer this motion to the United States District Court for the Eastern District of Pennsylvania where the underlying litigation

1 was filed and is pending. The basis for Ms. Zhu's motion relates to two orders issued
2 by District Judge J. Curtis Joyner in the underlying action dated April 9, 2019 and
3 June 24, 2019, respectively, limiting permissible discovery at this early stage of the
4 litigation to certain issues, none of which relate to Ms. Zhu's requested testimony.
5 The underlying action is captioned *Spring Pharmaceuticals, LLC v. Retrophin, Inc., et*
6 *al.*, 2:18-cv-04553-JCJ (E.D. Pa.).

7 Filed contemporaneously with this Motion is a Memorandum of Law in Support
8 of this Motion, containing non-party Lesley Zhu's arguments to quash the Subpoena
9 and for her reasonable attorneys' fees, as well as the Declaration of Lesley Zhu with
10 accompanying exhibits.

11 This motion is made following the conference of counsel pursuant to L.R. 7-3,
12 which first took place on June 19, 2019.

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14 Dated: June 27, 2019

DUANE MORRIS LLP

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16 By: s/Cyndie M. Chang
17 Cyndie M. Chang
18 Attorneys for Non-Party Lesley Zhu
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